

**GUIDANCE FOR THE
WILLIAM F. GOODLING EVEN START
FAMILY LITERACY PROGRAMS**

**PART B, SUBPART 3 OF TITLE I
OF THE
ELEMENTARY AND SECONDARY EDUCATION ACT (ESEA)**



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**GUIDANCE FOR THE WILLIAM F. GOODLING
EVEN START FAMILY LITERACY PROGRAMS
SEPTEMBER 29, 2003**

INTRODUCTION

Even Start is an education program for the Nation's low-income families that is designed to improve the academic achievement of parents and their young children, especially in the area of reading. Researchers, teachers, and administrators alike now acknowledge the vital importance of high-quality early childhood education for all children. Young children who have good vocabularies and who are taught early reading skills before they start school are more likely to become good readers and to achieve academic success throughout their school careers. Education experts also acknowledge that parents play a critical role in the language and intellectual development of their children. Children who have parents who talk and play with them and who read to them have an important advantage. And parents who themselves are competent readers are more likely to have good jobs and be able to help their own children in school. Even Start provides educational services for the family, parents and children alike, so that adults and their children will be able to take advantage of and benefit from the tremendous opportunities available to them in this Nation. For adults and children with limited English proficiency, Even Start helps them make progress toward acquisition of the English language and attainment of a high level of literacy.

The Even Start Family Literacy program was first enacted in 1988 as Part B of Chapter 1 of Title I of the Elementary and Secondary Education Act of 1965 (ESEA). Most recently, the program was reauthorized and amended by the No Child Left Behind Act of 2001 (NCLB). With the enactment of NCLB, two programs that complement Even Start are the Reading First and Early Reading First programs. The Reading First program gives funds to States to invest in scientifically based reading instructional programs for the early grades; and the Early Reading First Program gives funds to districts and other entities to support the early language, literacy, and pre-reading development of preschool-age children.

Even Start started in FY 1989 with an initial \$14.8 million appropriation that supported 76 projects and 2,460 families. By FY 2000, the appropriation was \$150 million, and 860 projects served 36,000 families. In FY 2003, the \$248.4 million appropriation will fund some 1,200 projects that will serve more than 50,000 families.

From the total Even Start appropriation, the majority of the funds go to States for State-administered subgrants. With the remaining funds set aside at the Federal level, the following activities are conducted: (1) migrant, Outlying Areas, and Indian tribal programs; (2) a women's prison demonstration project; (3) evaluation, technical assistance, program improvement, and replication activities; (4) research on family literacy; and (5) Statewide family literacy initiative grants (depending on the appropriation level).

BACKGROUND

Even Start offers promise for helping to break the intergenerational cycle of poverty and low literacy in the Nation. The program integrates early childhood education, adult literacy (adult basic and secondary-level education and/or instruction for English language learners), parenting education, and interactive parent and child literacy activities into a single, unified family literacy program. The design is based on the premise that these components build on each other and that families need to receive high-quality instructional services in all four areas -- not just one or two -- in order to bring lasting change and effectively improve parents' and children's literacy achievement. Even Start supports integrated family literacy services for parents and children, primarily from birth through age seven, and has three interrelated goals:

- to help parents improve their literacy or basic educational skills;
- to help parents become full partners in educating their children; and
- to assist children in reaching their full potential as learners.

The term “family literacy services” is defined in section 9101(20) of the ESEA as services provided to participants on a voluntary basis that are of sufficient intensity in terms of hours, and of sufficient duration, to make sustainable changes in a family, and that integrate all of the following instructional activities:

- (A) Interactive literacy activities between parents and their children.
- (B) Training for parents regarding how to be the primary teacher for their children and full partners in the education of their children.
- (C) Parent literacy training that leads to economic self-sufficiency.
- (D) An age-appropriate education to prepare children for success in school and life experiences.

At minimum, a successful Even Start project should: build on high-quality, community resources; employ qualified staff; carry out instructional activities grounded in scientifically based reading research; be able to document significant literacy achievement results (for adults and children) for the majority of families served; and make sufficient program progress as defined by the State.

We have learned from the previous national evaluations of Even Start that:

- The instructional focus must be on literacy and cognitive development.
- Intensity of services and duration of program participation are correlated with participant achievement.
- Data must be used for program improvement.
- State and local programs must develop and implement a well-defined system of ongoing program monitoring and evaluation that focuses upon effective practices and program results.

PURPOSE OF THIS GUIDANCE

This Guidance for the William F. Goodling Even Start Family Literacy Programs is written to assist States and local projects in understanding, administering, and implementing the Even Start program. The Guidance reflects changes made to the program by the Literacy Involves Families Together (LIFT) Act of 2000 that are reinforced and further strengthened by the No Child Left Behind Act of 2001. Guidance in this document replaces all prior nonregulatory guidance for Even Start and also addresses questions raised by State and local officials regarding the law. States may refer to this guidance when administering funds under the State-administered portion of the Even Start program, and local recipients of Even Start funds may refer to this guidance when administering or operating projects supported by subgrants awarded by States or by direct grants from the U.S. Department of Education. This document includes an explanation of the statutory requirements authorized by NCLB and provides guidance for carrying out these requirements.

Citations in the document, unless otherwise indicated, are to the ESEA.

This document does not impose any requirements beyond those in the Even Start statute and other applicable Federal statutes and regulations. While States may consider this guidance in developing their own guidelines and standards, they are free to develop alternative approaches that are consistent with applicable Federal statutes and regulations. In other words, this document contains acceptable but not exclusive guidance concerning Even Start. However, compliance with the guidance in this document will be deemed by U.S. Department of Education (ED) officials, including the Inspector General, as compliance with the applicable Federal statutes and regulations.

STATE ADMINISTRATION

The Department awards formula grants to State educational agencies (SEAs or States), with each State receiving funding based on the relative proportion of funds it receives under the Part A of Title I allocation formula. States subsequently make competitive discretionary subgrant awards to partnerships of local educational agencies (LEAs) and other public and private entities for Even Start Family Literacy projects.

State Plans

States must submit a State plan to the U.S. Department of Education for their administration of Even Start, but may apply for Even Start funds either through a consolidated State plan under section 9302 or through a separate Even Start State plan. (See the Education Department General Administrative Regulations (EDGAR), sections 76.100 – 76.106.)

Committee of Practitioners

Each State must form a Committee of Practitioners to advise the State in carrying out its responsibilities under Even Start and other programs under Title I of the ESEA. The Committee of Practitioners reviews, prior to publication, any proposed or final State rules or regulations issued concerning the program. (Section 1903(b))

The Committee of Practitioners must also be substantially involved in the development of the separate or consolidated State plan and continue to be involved in the monitoring of the plan's implementation by the State. For example, the Committee reviews portions of the State plan describing the Even Start subgrant competition process.

Example: The Committee reviews a State's Even Start indicators of program quality to ensure that they are of high quality and coordinated with other related State-administered programs.

Membership

At a minimum, the Committee of Practitioners must include the following:

- representatives of LEAs, as a majority of its members;
- administrators;
- teachers, including vocational educators;
- parents;
- members of local boards of education;
- representatives of private school children; and
- pupil services personnel.

A State may also include additional members, such as family literacy experts or other individuals, who are familiar with Even Start. If no family literacy experts or individuals

familiar with Even Start are formally on the Committee of Practitioners, a State is encouraged to invite such persons to participate in Committee of Practitioners meetings if Even Start or family literacy policies are on the agenda for discussion.

Example: A Committee of Practitioners for a State is composed of: 20 urban and rural school administrators, two non-public school representatives, five parents, two pupil personnel services representatives, six teachers, one local school board member, and three liaisons from the State Education Department.

State-Level Activities

A State may reserve up to 6 percent of its Even Start grant for the following State-level activities:

- administration (Section 1233(a)(1));
- technical assistance under section 1233(a)(2), provided to Even Start subgrantees for program improvement and replication through one or more subgrants or contracts with third parties;
- technical assistance under section 1234(c), provided to Even Start subgrantees to improve the quality of Even Start family literacy services (early childhood education, adult literacy (adult basic and secondary-level education and instruction for English language learners), parenting education, and interactive parent and child literacy activities) through a subgrant, contract, or cooperative agreement with a qualified entity;
- technical assistance under section 1234(c) to help local programs raise additional funds, provided through a subcontract, contract, or cooperative agreement with a qualified entity; and
- activities to develop, implement, and use the State's Even Start indicators of program quality under section 1240.

As explained in more detail below, in order to support the high quality implementation of local projects, a State has significant flexibility under these various functions in how it divides State-level activities. The Secretary encourages States to specify in their accounting records how, and under what authority, the State is using its State-level funds. However, of the total that the State reserves for these State-level activities, the State may use no more than one-half of the total amount for administrative activities. (Section 1233(a))

Q1: If a State reserves a total of 4 percent from its Even Start grant for administration and technical assistance, what percentage can the State use for administration?

A1: The State can use no more than 2 percent, because the statute states that the costs for administration may not exceed half of the total amount reserved for both administration and technical assistance. In other words, a State may take up to half of the amount reserved, and not half of 6 percent.

After determining the amount of funds to be used for State-level activities (up to 6 percent of the State's total grant amount) and identifying the portion of those funds to be used for activities that it categorizes as administrative (up to one half of the total amount reserved), the State may use the balance of its State-level funds as described below to provide technical assistance and to carry out the State's indicators of program quality. The technical assistance should be designed to improve local programs and support the replication of successful programs, help local programs raise additional funds and improve the quality of Even Start family literacy services, and develop, implement, and use the State's indicators of program quality.

Administration

As explained above, a State may use up to one half of the total amount it reserves for State-level administrative activities. The State may use its administrative funds for indirect and direct administration costs, and to provide technical assistance and training to local Even Start projects to improve participant achievement results.

Q2: What indirect cost rate applies to the funds that a State reserves for State-level activities?

A2: The State may use its unrestricted indirect cost rate for Even Start funds that the State reserves for State-level activities because Even Start is not subject to a supplement-not-supplant requirement. (EDGAR, sections 76.560 – 76.580.)

Under section 9201, a State may consolidate its Even Start administrative funds with State administrative funds from some of the programs under the ESEA if the SEA is able to demonstrate that the majority of the agency's resources come from non-Federal sources. Eligible programs under section 9201 include any ESEA program in which funds are authorized to be used for administration, and any other programs that the Secretary designates.

Technical Assistance

A State may provide training and technical assistance for local subgrantees in several ways. Different statutory requirements apply depending upon the type of training and technical assistance that the State chooses to provide. States may provide these activities directly, as part of the State's administrative function discussed above or as a part of its implementation of the State's Even Start indicators of program quality discussed below.

In addition, a State may use a portion of the non-administrative State-level funds it has reserved to provide technical assistance to Even Start projects under section 1233(a)(2), to improve those projects and replicate those of high quality. If the State chooses to provide technical assistance under section 1233(a)(2) to improve or replicate Even Start projects, it must also do so through a subgrant or contract with another entity. A State may also use a portion of the non-administrative State-level funds it reserves to provide technical assistance and training under section 1234(c), to assist local Even Start projects in improving the quality of their family literacy services (that is, to improve one or more of the Even Start core components that make up "family literacy services"). The State must provide this technical assistance and training through

one or more subgrants, contracts, or cooperative agreements with an entity that has experience in offering high-quality training and technical assistance to family literacy providers. In addition, the State must give priority to programs of low quality as evaluated based on a State's indicators of program quality.

For local programs that the State determines to have demonstrated effectiveness, the State also may use technical assistance funds under section 1234(c) to help those programs access and leverage additional funds to expand services to families and reduce waiting lists for services, including through using such mechanisms as requesting and applying for non-Federal resources.

Q3: How can a State provide technical assistance to help a local project in accessing and leveraging additional funds?

A3: A State may use some of the funds it reserves for State-level activities to provide technical assistance to help local projects, that have demonstrated their effectiveness in helping families make educational gains, to access and leverage additional funds in order to expand or sustain services to eligible families. Such technical assistance may include activities such as providing a grant writing or oral presentation workshop, assisting a local project in initiating a local campaign to attract greater community investment in the local project, or compiling a directory of available funding resources.

The State's use of funds for technical assistance and training in improving family literacy services under section 1234(c) may not result in a decrease from the level of activities and services that subgrantees provided to program participants in the previous year (section 1234(c)(1)). In other words, a State's reservation of funds for technical assistance and training under section 1234(c) cannot negatively affect the quality and intensity of services that can be provided by subgrantees to their program participants.

Developing and Using Even Start Indicators of Program Quality

A State may also use funds it reserves for technical assistance to develop and use its State indicators of program quality, as described in section 1240, to monitor, evaluate, and improve local projects within the State. These technical assistance activities, for example, may include training local project staff and evaluators on the following: how to improve the content of local evaluations so that they are aligned with State indicators of program quality; how to better use local evaluations for continuous program improvement; how to identify high quality professional development activities for local Even Start staff; and strategies to improve participant retention and literacy achievement results. (See National Evaluation, Local Evaluation, and Indicators of Program Quality -- Indicators of Program Quality section.) In addition, a State could use those funds to provide the technical assistance required under section 1233(a)(3) to improve local projects that have made insufficient progress on the State's indicators of program quality before the State discontinues those projects for insufficient progress.

Unlike the technical assistance and training that a State provides under sections 1233(a)(2) and 1234(c), a State may provide technical assistance and training under section 1240 to local

subgrantees and evaluators on its indicators of program quality either directly or through a contract with another qualified entity.

Q4: When can a State provide technical assistance and training directly?

A4: A State can directly provide technical assistance for activities related to the development and use (such as through monitoring, evaluation, and program improvement) of State indicators of program quality. For all other technical assistance and training, including helping local programs of demonstrated effectiveness to access and leverage additional funds for the purpose of expanding services and reducing waiting lists, a State must use an outside entity. (Sections 1233(a)(2) and 1234(c)(4))

Competition for Subgrants

The Even Start statute establishes certain required information that each local subgrant application must contain. (Section 1237) However, each State may develop its own application for funding and may require additional information relevant to its own subgrant competition. (EDGAR, section 80.37(a)) For example, a State may require applicants to address that State's Even Start indicators of program quality, priorities for funding that target areas that are especially underserved and in need of Even Start services, or any other relevant criteria to obtain the most qualified applicants. (See Local Application section.) However, any State priorities must be consistent with the statutory competitive priorities in section 1238(a)(2) explained below.

A State must follow certain statutory requirements in awarding subgrants, including using statutory selection criteria and statutory priorities and using a review panel that includes certain required members. (Section 1238(a), and the Review Panel and Selection Criteria sections.) However, except as required by the Even Start statute or other Federal statutes or regulations, a State follows its own policies and procedures when awarding subgrants and, therefore, has substantial discretion over the competitive process for allocating funds to high-quality local projects that can help families most in need of Even Start services attain literacy achievement results. (EDGAR, section 80.37(a)) For example, a State's process could include such things as on-site reviews, convening of panelists in one location for a paper review, or a two-tiered review process (using a combination of an on-site review and paper review).

Before issuing their instructions for a subgrant competition, the Department encourages States to consult with their Committees of Practitioners in developing the application review process, and any additions to the statutory selection criteria, and priorities that are consistent with those statutory requirements. (See Committee of Practitioners section.)

Review Panel

The SEA must establish a review panel to review and approve local subgrant applications. The review panel must consist of at least three members, including one early childhood professional, one adult education professional, and one individual with expertise in family literacy. Additional members may include one or more of the following: a representative of a parent-child education

organization, a representative of a community-based literacy organization, a member of a local board of education, a representative of business and industry with a commitment to education, or an individual who has been involved in the implementation of the State's Title I programs, which include Reading First and Early Reading First. (Section 1238(a)(3)) In order to ensure a fair and objective evaluation of applications, an SEA must follow State conflict-of-interest requirements or policies that it may have with respect to the review of subgrant applications.

Example: One State's review panel consists of five individuals: an SEA staff member who is an expert in early childhood education, a director of an effective adult education program, a local parent of the public school students who has family literacy experience, a local Head Start director, and a president of a local business coalition that funds after-school reading programs.

Selection Criteria

The review panel evaluates and approves local applications in accordance with the statutory selection criteria and priorities in section 1238(a) of the ESEA and any additional State requirements that are consistent with those statutory selection criteria and priorities. Those criteria include the likelihood of success in meeting the purposes of the Even Start program, and effectively implementing the 15 required program elements (see the Local Administration – Program Elements section). The approved applications also must be representative of urban and rural regions of the State. (Section 1238(a)(1)(G))

In addition, the applicant must demonstrate that the area to be served has a high percentage or a large number of children and families who are in need of Even Start services as indicated by high levels of poverty, illiteracy, unemployment, limited English proficiency, or other need-related indicators. (Section 1238(a)(1)(B)) Applicants must also show how they will provide services for at least a three-year age range, demonstrate the greatest possible cooperation and coordination between a variety of relevant service providers, include a cost-effective budget, demonstrate the applicant's ability to provide the local share of the program's costs, and show the greatest promise for providing models that may be adopted by other family literacy projects and other LEAs. (Sections 1238(a)(1)(C)-(F) and (H))

The SEA must give priority to applications that target services to areas of the State with a high percentage or large number of children and families in need of Even Start services, as indicated by high levels of poverty, illiteracy, unemployment, limited English proficiency, or other similar need-related factors. (Section 1238(a)(2)(A)) Examples of other similar need-related factors, as listed in section 1238(a)(1)(B), are: a high number or percentage of children to be served by the program who reside in a school attendance area eligible for participation in Title I, Part A programs, a high number or percentage of parents who have been victims of domestic violence, and a high number or percentage of parents who are receiving "Temporary Assistance to Needy Families." In addition, the SEA must give priority to applications for projects that are located in areas designated as empowerment zones or enterprise communities. (Section 1238(a)(2)(B)) To find areas in the State that have been designated as empowerment zones or enterprise communities, contact the Governor's office.

Q5: Can an applicant that is already receiving a direct Federal Even Start discretionary grant concurrently apply for a State Even Start discretionary subgrant?

A5: Yes, an applicant that is already receiving a direct Federal Even Start grant may concurrently apply for and receive a State Even Start subgrant. A State could ask for information about the direct Federal Even Start grant either in the application package or prior to funding a successful applicant. If an applicant is receiving or will be receiving a Federal Even Start grant, the State must ensure that it does not duplicate funding for the same activities and services. The State should monitor to ensure that the project maintains careful records that clearly distinguish between the Federal- and State-administered parts of the project (i.e., budgets, family lists, local evaluation).

Q6: What are a State's responsibilities towards unsuccessful applicants?

A6: Each State is governed by its own State laws and procedures in awarding subgrants. In addition, under applicable Federal law, an applicant that is aggrieved by the final action of the SEA and that alleges a violation of State or Federal law, rules, regulations, or guidelines governing the competition or the Even Start program has the right to request and receive a hearing on the record from the SEA within 30 days from the date of the SEA's final action being appealed. (See 20 U.S. C. 1231b-2(a), and EDGAR, section 76.401(d)(2)-(4).) The SEA must hold the hearing on the record within 30 days after it receives the request and issue a written ruling (including reasons for the ruling) within ten days after the hearing. A formal hearing on the record means that the SEA must provide, at minimum: notice of the hearing, an opportunity for the applicant to participate in the hearing and be represented by counsel, and an opportunity for the parties either orally or in writing to present and challenge evidence in an orderly fashion before an impartial decisionmaker. The SEA's decision may be appealed to ED, and then the State would be a party.

Eligible Entity

To qualify as an "eligible entity" for an Even Start subgrant, an applicant must be a partnership between one or more LEAs and one or more nonprofit community-based organizations, public agencies other than an LEA, institutions of higher education (including two- and four-year institutions), or public or private nonprofit organizations of demonstrated quality other than an LEA. (Section 1232(e)(1))

Q7: May a private nonprofit entity, such as a community-based or faith-based organization, serve as the fiscal agent for the required partnership that receives an Even Start subgrant?

A7: Yes, a private nonprofit entity, including a faith-based organization, as part of a partnership may serve as the fiscal agent for an Even Start subgrant. The private school participation requirements in section 9501 (applicable to Even Start since 2002) require in part that a public agency control and administer program funds used to provide equitable services to private school students. A properly constituted Even Start partnership meets this requirement regardless of which partner is the fiscal agent, because at least one partner in the Even Start subgrant must be an LEA which is a public agency, and the partner LEA is responsible, along with the other partners (including the fiscal agent if different from the LEA), for the proper expenditure of funds and compliance with all legal requirements.

Therefore, if the fiscal agent for an Even Start partnership is a private entity, the public partner(s), along with the other partners, is also responsible with that fiscal agent for properly administering funds used to provide equitable services to private school children and teachers. For guidance useful for an Even Start partnership using a community-based or faith-based organization as a fiscal agent, see “Guidance to Faith-Based and Community Organizations on Partnering with the Federal Government” found at www.whitehouse.gov/government/fbci/guidance/partnering.html.

A partnership may take a number of different forms and can designate any partner as the fiscal agent for the subgrant or form a formal legal entity that is a partnership to serve as the fiscal agent. However, in each case, the partners should clearly delineate their respective roles and functions, identify the partner(s) that will serve as the fiscal agent, and agree in writing to any required assurances and authorizations.

Example: An Even Start project in a Midwestern State is administered by a partnership comprised of the local school district, Department of Family Services, and Head Start. The LEA is the fiscal agent for the grant, and there is a signed, written agreement between the partners outlining the responsibilities of each of the three entities.

The partnership provisions in the Even Start law strengthen the connections between schools and communities and improve a project’s ability to reach families in greatest need of services through community outreach. The connection of a project to an LEA and a school’s resources also allows for greater ease in the continuity of family literacy services, especially when children make the transition between an early childhood education provider to a school.

In order to reach out to the greatest number of possible applicants, the Secretary encourages States to inform all potentially eligible partners of the availability of funds for an Even Start program and the process they should follow in applying for a subgrant.

Example: One State sent an announcement for the availability of funds and instructions for applications to all school superintendents, private schools, Title I coordinators, Head Start grantees, and Reading Excellence Act grantees. It also posted a notice on the State Department of Education's webpage.

Even Start projects are cooperative projects that build on high-quality, existing community resources to create a new range of services to serve families' educational needs. (Section 1231(2)(A)) In addition to the formal partners who comprise the eligible entity applying for funding and administering the grant, an Even Start project has a number of collaborators who provide direct instructional or support services to participating families and may contribute to the local project's matching or cost share. These collaborators might include such local agencies as: the community library, the community college, the welfare agency, a day care program, a professional association, a faith-based organization, or a volunteer organization. The Department encourages projects to cultivate community investment in the program by building on high-quality community resources or bolstering the quality of these community resources, if necessary by supplementing those services.

Project Funding

Minimum Subgrant Amounts

The Secretary encourages States to make subgrants that are of sufficient size, scope, and quality to be effective in meeting the purposes of Even Start, allow projects to meet their program objectives and participant achievement goals, and make maximum use of the resources available at the local community level. (Section 1233(b)) SEAs are encouraged to make continuation awards of sufficient size to ensure each project's continuity of high-quality services and successful program outcomes and participant achievement results. After reserving funds for administration and technical assistance and funding continuation grants for projects that demonstrate sufficient progress toward meeting their individual program objectives and the State's Even Start indicators of program quality, States must use the remaining funds to award new subgrants. (Section 1233(b))

The minimum amount of Federal funds required for a subgrant for programs in their first through eighth year of operation generally is \$75,000 per year. The minimum subgrant size of \$75,000 per year is reduced to \$52,500 for recipients in their ninth and succeeding years. If less than \$75,000 of Federal funds remain available for a fiscal year after the State has awarded all other subgrants, the SEA may fund one subgrant of less than \$75,000 for a project in its first through eighth year of operation for that fiscal year, or one subgrant of less than \$52,500 for a project in its ninth or subsequent year of operation for that fiscal year. However, each State may have only one project operating under these conditions at any given time. (Section 1233(b)(2))

Federal and Local Share

An Even Start project's funding is comprised of a portion of funds attributable to the Federal grant (Federal share) and a portion contributed by the project (local share). The amount of the local share in the first year of the local project's grant must be at least 10 percent of the total cost

of the project. In the second year of Federal funding, the project must provide at least 20 percent of the total cost of the second-year budget; in the third year, at least 30 percent of the third-year total budget cost; in the fourth year, at least 40 percent of the fourth-year total budget cost; in the fifth through eighth years, at least 50 percent of each year's total budget cost; and in each subsequent year, at least 65 percent of each year's total budget cost. (See Duration of a Project – Continuing Eligibility section.) (Section 1234(b)(1))

Example: Local Project Total Budget			
	<u>Federal Share</u>	<u>Local Share</u>	<u>Total Budget</u>
Year 1	no more than 90%	at least 10%	= 100%
Year 2	no more than 80%	at least 20%	= 100%
Year 3	no more than 70%	at least 30%	= 100%
Year 4	no more than 60%	at least 40%	= 100%
Year 5-8	no more than 50%	at least 50%	= 100%
Year 9+	no more than 35%	at least 65%	= 100%

It is not necessary to reduce a project's grant award each year in order to satisfy the requirements for the progressively increased local share. Instead, a State may keep a project's grant award constant and require a sufficient increase in the local share. Or, a State may even increase the grant award for subsequent years, so long as there is a sufficient local share. The important consideration is that each project receives sufficient funds to operate a high-quality program that generates successful participant achievement results.

Example 1: In the first year of Federal funding, a project is responsible for providing at least 10 percent of the total cost of the project. Therefore, to determine the maximum Federal share from the total cost of the proposed project, the total project cost is multiplied by 90 percent. For example, if \$225,000 is the total cost of the project, that figure is multiplied by 90 percent to determine the maximum Federal share ($\$225,000 \times .90 = \$202,500$). Based on a total budget of \$225,000, the Federal share must be no more than \$202,500 in the first year. The local share is then calculated by subtracting the Federal share from the total project cost ($\$225,000 - \$202,500 = \$22,500$).

Example 2: In the second year of Federal funding, a project is responsible for providing at least 20 percent of the total cost of the project. Therefore, to determine the maximum Federal share from the total cost of the proposed project, the total project cost is multiplied by 80 percent. For example, if \$280,000 is the total cost of the project, that figure is multiplied by 80 percent to determine the maximum Federal share ($\$280,000 \times .80 = \$224,000$). Based on a total budget of \$280,000, the Federal share must be no more than \$224,000 in the second year. The local share is then calculated by subtracting the Federal share from the total project cost ($\$280,000 - \$224,000 = \$56,000$).

If a project knows the Federal share amount rather than the total project cost and wishes to calculate the local share, it must first calculate the total project cost. For example, in the second year of a project, if the amount of Federal Even Start funds to be provided is \$224,000 and that amount will be 80 percent of the project's total budget, the project would calculate the total minimum project cost by dividing the Federal share by 80 percent ($\$224,000 \div .80 = \$280,000$). The amount of the local share may then be determined by multiplying the resulting total project cost by 20 percent ($\$280,000 \times .20 = \$56,000$). Based on a Federal share of \$224,000, the project would be required to contribute at least \$56,000 in the second year.

A local project may provide its local share in cash or through in-kind contributions, fairly evaluated. The project may obtain its local share from any source, including any Federal funds other than Even Start funds. (Section 1234(b)(1)(B)) For an explanation of how to place a value on specific third-party in-kind contributions, see EDGAR, section 74.23 (for institutions of higher education and non-profit organizations) and section 80.24 (for LEAs and Indian tribes).

An Even Start project may only use allowable costs to satisfy the project's local share. (See EDGAR, section 80.24.) For example, indirect costs are not allowable for Even Start local projects and, therefore, may not be used to meet a project's local share. (Section 1234(b)(3))

Example: One local project used the following in-kind contributions to the project as its local share: computers donated by a local business for adult education classes, use of a portion of the local library for parenting classes, a portion of the reading supervisor's time, use of a local church basement for the early childhood education component, and time donated by a senior citizens' group for child care.

In addition, a project may only count costs or values of third-party in-kind contributions toward satisfying its local share for one Federal grant or contract at a time. For example, if Head Start is a collaborating agency with an Even Start project and counts a volunteer teacher's time for all of the children (including the children participating in Even Start) toward satisfying a Head Start matching requirement, the Even Start project may not count that same teacher's time toward meeting the Even Start local share. In the alternative, the Head Start program and the Even Start program may agree to split the value of the volunteer teacher's time proportionately, based on the numbers of Head Start and Even Start children served by that teacher, between the two programs for the purpose of each program's respective matching requirement.

Q8: What type of records must a local project keep of the cash and in-kind contributions to the project that comprise its local share?

A8: A local Even Start project must keep records that verify the cash and in-kind contributions that the project counts toward satisfying its local share. These records must include information on how the project derived the value placed on third-party in-kind contributions. (EDGAR, section 80.24 (b)(6))

Q9: Can an SEA fund a local project that cannot contribute the required local share amount?

A9: Yes. Under certain conditions, an SEA may waive all or part of the local share requirement. The project must demonstrate to the SEA's satisfaction that the project would otherwise not be able to participate in the Even Start program. The project must also negotiate an agreement with the SEA as to the amount of the required local share to which the waiver would be applicable. (Section 1234(b)(2))

Indirect Costs

Under the statute, Even Start funds generally may not be used for the indirect costs of a local Even Start project. Under certain circumstances, the Secretary may waive this limitation for Indian tribe or tribal organization Even Start grants from the Department. (Section 1234(b)(3))

Duration of a Project

A local project's grant period may not exceed four years. (Section 1238(b)(1)) The Secretary encourages SEAs to award grants for periods of at least two years to allow projects sufficient time to implement fully all program elements and core components and have one year of data to use for demonstrating continuous improvement. After the end of a project's grant period, the Even Start project may reapply and compete for additional grants or subgrants of Even Start funds. (Section 1238(b)(5))

Start-Up Period

Implementing a new Even Start project presents many challenges, and experience has shown that the average new project takes several months to become fully operational. At an applicant's request, an SEA may provide funds to a subgrantee for a three-to-six month start-up period during the first year of a grant period before requiring full implementation of the project. During this start-up period, a project may use its Even Start funds for such activities as staff recruitment and training, and coordination of services. (Section 1238(b)(2))

Continuing Eligibility

In making continuation awards from year to year during a project's grant period, an SEA has considerable discretion over the amount of the continuation award and may weigh a variety of

factors in determining whether a subgrantee has made sufficient progress. However, in an SEA's review of a subgrantee's progress, it must always consider the subgrantee's progress in meeting the objectives of its program and its progress on the State's Even Start indicators of program quality. (Section 1238(b)(3))

Q10: When does a previously funded applicant qualify as proposing a new project? As a new project, how much does it receive for its Federal share?

A10: States have flexibility in making these determinations. A significant project change is needed to create a new Even Start program eligible for funds. For example, a State could reasonably interpret the statute to allow an LEA that has previously been a partner in a funded project to join with other entities in a new partnership and apply for funds to operate a project in a different high-need area of the city.

When a new eligible recipient qualifies for year 1 funds, the maximum Federal cost share begins anew at the 90 percent maximum because there is, in effect, a new program. However, as always, a State has flexibility in providing whatever level of Federal funding it believes appropriate, up to the maximum allowable level.

Insufficient Progress

An SEA may refuse to award continuation funds to a subgrantee if the SEA determines that the program has not made sufficient progress, as evaluated against the State's Even Start indicators of program quality. Before discontinuing a subgrantee, a SEA must first provide technical assistance to see if the program can improve its progress on the State indicators of program quality and also give the subgrantee notice and an opportunity for a formal or an informal hearing. (Section 1238(b)(4)) The hearing requirement can be satisfied by the SEA providing a formal hearing on the record as described above under the Selection Criteria section, or by providing an informal hearing before the denial and the formal hearing on the record if requested by the applicant after the final denial of funds. SEAs are encouraged to keep records describing the technical assistance that has been given in compliance with these requirements.

LOCAL ADMINISTRATION

Program Elements

Each local Even Start program is a complex project comprised of many different elements that when added, should equal more than the sum of each individual element. The fifteen statutory required program elements for Even Start projects, primarily grounded in research and national evaluation data, are intended to ensure that projects offer high-quality services so that all participating families can achieve their literacy goals. (Section 1235)

It is important to note that all Even Start projects funded both before and after the December 21, 2000 LIFT Act reauthorization are subject to that law's new requirements and, therefore, must be implementing all fifteen required program elements. Note that, the following program elements (numbered by their statutory paragraph number in section 1235) were new in 2000: #5 (staff qualifications); #10 (instructional programs based on scientifically based reading research); #11 (attendance and retention of families); #12 (reading readiness activities based on scientifically based reading research); and #13 (continuity of family literacy services). In addition, program element numbers 8 (year-round services) and 15 (local independent evaluation) have been amended. Local applications for continuing subgrantees should be amended to reflect compliance with the new requirements. (Section 1237(c)(2)(B))

These program elements clarify the methods for the best implementation of the four Even Start core requirements -- early childhood education, adult literacy (adult basic and secondary-level education and/or instruction for English language learners), parenting education, and interactive literacy activities between parents and their children -- and the activities needed to support successful programs. Program elements 1, 2, 11, and 14 relate to the targeting of Even Start services to the families most in need and ready to commit to the four-component program. Program elements 3-8 and 10 and 12 focus on the delivery of high-quality instructional and support services so participants can better achieve literacy gains. Program elements 9 and 13 describe coordination with relevant programs to complement and supplement the work of the local Even Start project. And program element 15 highlights program accountability and linkages between program implementation and participant outcomes. An elaboration of each program element is provided below.

1. ***Identification and Recruitment of Families Most In Need of Even Start Services.*** (Section 1235(1)) Each project must identify and recruit families most in need of Even Start services, as indicated by a low level of income, a low level of adult literacy or English language proficiency of the eligible parent or parents, and other need-related indicators. It is important to note the distinction between families that are considered "eligible" for Even Start services and those actually served by a project. Even Start projects serve a small subset of the "eligible" population and must target families who are most in need of family literacy services.
2. ***Screening and Preparation of Participants.*** (Section 1235(2)) Each project must screen and prepare parents (including teenage parents) and children to enable such parents and children to participate fully in Even Start activities and services. This includes testing of

parents to ensure eligibility for services, referral to necessary counseling, other developmental and support services, and related services. A project should ensure that each member of an eligible family is fully ready to commit to the entire four-component Even Start program prior to considering them for program participation.

3. ***Flexible Scheduling and Support Services.*** (Section 1235(3)) Each project must be designed to accommodate participants' work schedules and other responsibilities. This includes providing support services, when such services are unavailable from other sources, which are necessary for full participation in the Even Start program. Flexibility in scheduling classes in order to optimize family participation and retention is especially critical given the demands of work participation requirements for public assistance, as is providing support services such as transportation, child care, and meals. However, the main focus of the Even Start program should still remain on providing high-quality instructional services and ensuring that participants make literacy gains.
4. ***High-Quality, Intensive Instructional Programs.*** (Section 1235(4)) Each project must provide high-quality, intensive instructional programs that promote adult literacy and empower parents to support the educational growth of their children, developmentally appropriate early childhood services, and preparation of children for success in regular school programs. Each of the four core components is considered an instructional program.
5. ***Staff Qualifications.*** (Section 1235(5)) Each project must meet the following staff qualification requirements for staff whose salaries are paid in whole or in part with Even Start funds. Staff who are not paid with Even Start funds, such as staff supported by collaborators or partners, are not subject to the requirements of this program element. However, whatever the funding source, the Secretary encourages a project to make a concerted effort to use the most highly qualified staff available.

Staff providing academic instruction

Instructional staff are considered those staff members who provide instruction in the four core Even Start components.

All instructional staff – by December 21, 2004, a majority of the individuals providing academic instruction:

1. must have obtained an associate's, bachelor's, or graduate degree in a field related to (see Q11) early childhood education, elementary or secondary school education, or adult education; and
2. if applicable, must meet qualifications established by the State for early childhood education, elementary or secondary school education, or adult education provided as part of an Even Start program or another family literacy program. (Section 1235(5)(A)(i))

New instructional staff who are hired to work in Even Start projects must, when they are hired:

1. have obtained an associate's, bachelor's, or graduate degree in a field related to early childhood education, elementary or secondary school education, or adult education; and
2. if applicable, meet qualifications established by the State for early childhood education, elementary or secondary school education, or adult education provided as part of an Even Start program or another family literacy program. (Section 1235(5)(B))

Q11: What is considered “a field related to...”?

A11: Because States have different teacher certification requirements for the various Even Start core components, States have discretion over what qualifies as “a field related to...” when monitoring the quality of local projects’ staff. The Secretary encourages States to be mindful that the intent of the staff qualification requirements is to improve participant and programmatic outcomes, and more of the correlation between highly qualified staff and student achievement.

Q12: When is a staff member considered “new instructional staff”?

A12: Any staff member who is newly hired by a project is considered to be new personnel, regardless of any previous experience that staff member may have in other Even Start projects. In addition, if an Even Start project applies and qualifies as a new local project because of changes in the partnership or nature of the project, all staff then are considered to be new personnel.

Q13: Are the staff qualification requirements different for Even Start instructional staff when Even Start is part of a schoolwide program as defined in section 1114?

A13: Yes. If Even Start is part of a schoolwide program as defined in section 1114, public elementary and secondary school teachers of core academic subjects (English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, art, history, and geography), regardless of the source of their salary, must meet the Title I, Part A teacher qualification requirements as set forth in sections 1119(a)(1) and 9101(23) and implemented in Title I regulations published at 67 Federal Register 71710-71771 (12/2/02) and available at www.ed.gov/legislation/FedRegister/finrule/2002-4/120202a.html.

Project Director

Not later than December 21, 2004, the individual responsible for administration of family literacy services must have received training in the operation of a family literacy program. (Section 1235(5)(A)(ii))

Q14: What type of training should administrators of family literacy services receive?

A14: States have discretion over what qualifies as appropriate training. However, to ensure successful Even Start projects, training should be of sufficient quality, duration, and intensity to increase an administrator's knowledge of how to manage and operate a family literacy program successfully.

Paraprofessionals

Not later than December 21, 2004, paraprofessionals who provide support for academic instruction must have a high school diploma or its recognized equivalent. (Section 1235(5)(A)(iii))

Q15: Given the new staff qualifications requirements for those staff providing academic instruction, what “support for academic instruction” activities can be performed by paraprofessionals?

A15: Paraprofessionals can reinforce and practice instructional activities with students after instructors have initially taught the activity or lesson.

Q16: Are the staff qualification requirements different for Even Start paraprofessionals when Even Start is part of a schoolwide program as defined in section 1114?

A16: Yes. If Even Start is part of a schoolwide program as defined in section 1114, Even Start paraprofessionals, regardless of the source of their salary, must meet the Title I, Part A paraprofessional requirements as set forth in section 1119(c-g) and implemented in Title I regulations published at 67 Federal Register 71710-71771 (12/2/02) and available at www.ed.gov/legislation/FedRegister/finrule/2002-4/120202a.html.

6. ***Staff Training.*** (Section 1235(6)) Each project must train staff, including child care staff, to develop the skills necessary to work with parents and young children in the full range of Even Start instructional services offered. Effective staff professional development may include a set of activities that produce a demonstrable and measurable effect on student academic achievement, and may include activities such as coaching and mentoring. While not directly applicable to the Even Start program, you may find useful concepts on high-quality professional development in Part B of the Title II, Part A guidance (Improving Teacher Quality, State Grants), located at www.ed.gov/offices/OESE/SIP/TitleIIGuidance2002.doc.

7. ***Home-Based Instructional Services.*** (Section 1235(7)) Each project must provide and monitor integrated instructional services to participating parents and children through home-based services. Even Start projects should provide home-based services for every Even Start family on a regular basis. These services should be designed to improve the literacy skills of parents or their children, or both, and communicate the message that the home is a child's first classroom, just as the parent is a child's first teacher.
8. ***Year-Round Services.*** (Section 1235(8)) Each project must operate on a year-round basis, including the provision of some program services, instructional and enrichment, during the summer months. This allows families to receive continuous opportunities to improve their learning and avoid the drop-off in achievement that often occurs during long breaks or vacations. Therefore, the families served during the summer should be the same families served during the school year.
9. ***Coordination with Other Programs.*** (Section 1235(9)) Each project must coordinate with relevant programs, such as Title I, Part A, Early Reading First, Reading First, Migrant Education, 21st Century Community Learning Centers, Head Start, and volunteer literacy programs. Local projects must also coordinate with any relevant programs under the Adult Education and Family Literacy Act, the Individuals with Disabilities Education Act, and Title I of the Workforce Investment Act of 1998, and any other relevant programs.
10. ***Instructional Programs Based on Scientifically Based Reading Research.*** (Section 1235(10)) Each project must use instructional programs based on scientifically based reading research (as defined in section 1208) for children and adults, to the extent such research is available. The underlying premise of basing instructional programs on scientifically based reading research is that using strategies and techniques that are demonstrated to be effective through the application of scientific research methods will give States, districts, and schools a higher probability that children enter school prepared to learn to read and adults significantly improve their literacy and help their children succeed in school.

Section 1208 states that the term "scientifically based reading research" means research that—

- (A) applies rigorous, systematic, and objective procedures to obtain valid knowledge relevant to reading development, reading instruction, and reading difficulties; and
- (B) includes research that –
 - (i) employs systematic, empirical methods that draw on observation or experiment;
 - (ii) involves rigorous data analyses that are adequate to test the stated hypotheses and justify the general conclusions drawn;
 - (iii) relies on measurements or observational methods that provide valid data across evaluators and observers and across multiple measurements and observations; and
 - (iv) has been accepted by a peer-reviewed journal or approved by a panel of independent experts through a comparably rigorous, objective, and scientific review.

11. ***Attendance and Retention.*** (Section 1235(11)) Each project must encourage participating families to attend regularly and to remain in the program a sufficient time to meet their program goals. Each individual program determines what is reasonable attendance for a family in order to achieve its educational goals and to remain as active participants in the program. If a family is not attending regularly, the project needs to work with the family to determine what is needed to allow them to be active participants. If such attempts still fail, the project should transition the family out of Even Start, perhaps to a more suitable program, and recruit a more committed family.
12. ***Reading Readiness Activities Based on Scientifically Based Reading Research.*** (Section 1235(12)) Each project must base its reading readiness activities for preschool children on scientifically based reading research (as defined in section 1208), to the extent available, to ensure children enter elementary school with the language, cognitive, and early reading skills necessary for reading success. Research shows that the most effective ways to reach this goal include: 1) creating classroom environments rich in age-appropriate print (from sources such as books, labeling, and posting the alphabet and children's pre-writing work); 2) teachers who deliver intentional, contextualized, and explicit instruction that supports children's age-appropriate development of oral language, phonological awareness, print awareness, and alphabet knowledge; 3) progress monitoring to determine which skills children are learning; and 4) intensive and ongoing professional development that includes mentoring and coaching in the classroom.
13. ***Continuity of Services.*** (Section 1235(13)) Each project must promote the continuity of family literacy, to the extent applicable, to ensure that individuals retain and improve their educational outcomes. Educational services supplementing in-school instruction provided through the early school years can be critical to sustaining gains made during the preschool years.

Example: A participating family is comprised of a limited English proficient father and his 4-year-old daughter. He is working on completing his GED through the local community college, his daughter receives early childhood services through Head Start, and the Even Start project provides the remaining core Even Start services. When the daughter transitions to kindergarten, the Even Start project must ensure that there is continuity in her educational services. This continuity could be promoted through periodic conversations between the Even Start teacher, her school teacher, and her parents to track her academic progress. The Even Start teacher could then maintain a portfolio that contains copies of her schoolwork and provide any applicable supplementary educational services to support her learning.

14. ***Providing Services to Families Most In Need.*** (Section 1235(14)) Each project must ensure that the program will serve those families most in need of Even Start activities and services. This is related to Program Element #1.
15. ***Local Independent Evaluation.*** (Section 1235(15)) Each project must provide for an independent evaluation of the program that it will use for program improvement. The

independent evaluation generally is conducted annually and provides critical data and information to the local program on the performance of each family, as well as on the quality of the implementation of the core components and program elements. The project must use the data and information for participant progress monitoring and continuous program improvement to lead to better participant outcomes. (See the Local Evaluation section of this guidance for further information.)

Although included as an application requirement rather than as a program element, each project must also provide services for at least a three-year age range of children, which may begin at birth. (Section 1238(a)(1)(C) and the State Administration – Selection criteria section.)

Participant Eligibility

To be eligible for Even Start, a family that qualifies as “most-in-need” (Program Element section, Program Element #1) must have at least one eligible parent and one eligible child, as described below, participating together. (Section 1236)

Parents

The definition of “parent” includes, in addition to a biological or adoptive parent, a legal guardian or other person standing “in loco parentis.” Generally, “in loco parentis” means a person acting in place of a parent and may include a person such as a grandparent or stepparent with whom the child lives, or a person legally responsible for the child’s welfare. (Section 9101(31))

To be eligible for Even Start, an adult must be the “parent” of an eligible child, and either be:

- (1) eligible for participation in adult education and literacy activities under the Adult Education and Family Literacy Act;
 - (2) within the State’s compulsory school attendance age range, so long as an LEA provides or ensures the availability of the basic education component required under this part; or
 - (3) attending secondary school.
- (Section 1236(a)(1))

Eligible participants under the Adult Education and Family Literacy Act are individuals:

- (1) who have attained 16 years of age;
- (2) who are not enrolled or required to be enrolled in secondary school under State law; and
- (3) who--
 - (i) lack sufficient mastery of basic educational skills to enable the individuals to function effectively in society;
 - (ii) do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or
 - (iii) are unable to speak, read, or write the English language.

Q17: Is a parent with a high school diploma or its equivalent eligible to participate in Even Start?

A17: Yes, if the parent is eligible under the Adult Education and Family Literacy Act and lacks sufficient mastery of basic educational skills to function effectively in society and meets the other criteria as stated above. It is important to keep in mind, however, that projects are required to ensure that eligible families most in need of services are selected for Even Start. (Sections 1235(1), 1235(14), and 1237(c)(1)(E)(i))

Q18: Are teen parents eligible for services?

A18: Yes, generally all teen parents with eligible children can be served, so long as they meet all other eligibility requirements established by the local project, such as low income and low literacy levels.

Children

Children at birth through age seven are eligible to participate in Even Start if their parent or parents are eligible for and participating in Even Start services. (Section 1236(a)(2))

Children over the age of seven also are eligible to participate in Even Start with an eligible parent if the local project collaborates with a program under Title I, Part A of ESEA, and Title I, Part A funds contribute to the cost of providing Even Start program services to those children. Although the participation of families with children over the age of seven is now permissible, the focus of a local program must continue to remain on families with young children. (See the Title I, Part A Collaboration section of this guidance for further information.)

Parents or Children in Private Schools

The equitable participation provisions, applicable to Even Start for the first time under NCLB, are found in sections 9501-9504. These provisions require recipients of Federal funds to provide eligible school-age children who are enrolled in private elementary and secondary schools, and their teachers or other educational personnel, educational services and benefits under those programs on an equitable basis. Eligible entities must provide the equitable services after timely and meaningful consultation with the appropriate private school officials. The services must be provided by the eligible entity or through a contractor that is independent of any private school or religious organization.

This means that Even Start projects must consult with private school officials to determine how to ensure that private school students (elementary and secondary) are given the same opportunity to participate in the Even Start project as their public school counterparts. (See the Parents and Children sections of this guidance above for further information on who is eligible for Even Start, whether they attend public or private schools.) Specifically, the eligible entity must consult with private school officials to determine how to provide equitable Even Start services to

eligible families in Even Start that have children enrolled in private elementary schools or parents enrolled in private secondary schools.

Consultation between public and private school officials must occur before any decision is made that could affect the ability of private school families to participate (that is, as the project is being designed and before the application is submitted to the subgrant competition) and should continue throughout the implementation and assessment of activities. Consultation generally must include discussions on such issues as: how the private school families' needs will be identified; what services will be offered; how and where the services will be offered and provided; who will provide the services; how the services will be assessed and how the results of assessments will be used to improve those services; the amount of funds available for services; the size and scope of services to be provided; and how and when the LEA/agency will make decisions about the delivery of services. The Even Start services for eligible private school students must be comparable to the services for their public school counterparts in terms of quality, scope, and opportunity for participation. In addition, total program expenditures for services and benefits for participating elementary and secondary private school students must be equal (taking into account the relative numbers of those private and public school students participating in the Even Start program and their needs) to the expenditures for participating elementary and secondary public school students.

Other Family Members

Family members of eligible participants may participate in activities and services provided by an Even Start project, when appropriate, to serve the purposes of the program. For example, if the participation of an older sibling would enhance learning for the participating parent and child, then the older sibling may participate in appropriate Even Start activities such as home-based interactive literacy activities between parents and their children.

Eligible Participants Enrolled in Other Programs

So long as participating families meet the Even Start eligibility requirements described in section 1236, and qualify as most in need of Even Start services, they may participate in the program. Even Start is designed to build on, rather than duplicate, already existing high-quality community resources. Therefore, a child's enrollment in a high-quality Head Start program or, for school-age children, enrollment in a high-quality, regular school program, could satisfy the required early childhood education component of Even Start. Likewise, a parent's enrollment in a high-quality, adult basic education program could fulfill the adult education component of the Even Start program. In both examples, the Even Start project should provide supplemental learning opportunities to reinforce what is being taught through its collaborators and partners. The project's responsibility is to ensure the family receives all four core components at high enough levels of quality, either through a collaborator or directly from the project, in order for families to make literacy achievement gains.

Migrant and Indian Families

Eligible migrant and Indian families in need of family literacy services may participate like any other family in an Even Start project under the State-administered program. Organizations serving migrant families or Indian tribes or tribal organizations may also apply to SEAs for subgrants in partnership with an LEA, if the organizations qualify as one of the required entities under section 1232(e)(1)(B).

In addition, migrant and Indian families may participate in programs funded through the Federal set-aside programs for migrant and federally recognized Indian tribes and tribal organizations. For each fiscal year in which the appropriation is greater than \$200 million, the Secretary must reserve six percent of the funds appropriated for the Even Start program (if the appropriation is \$200 million or less, five percent of such amount) for grants to projects serving migrant families, the outlying areas, and federally recognized Indian tribes and tribal organizations. (Section 1232(a)(1)) However, if the same migrant or Indian tribe or tribal organization receives both a grant from the Secretary and a subgrant from the SEA for an Even Start project, the funds may not be used for duplicative purposes (that is, the funds may not be used to provide the same services to the same families). (EDGAR, sections 75.531 and 76.760)

Continuing Family Eligibility

Families generally may participate in Even Start Family Literacy program services until all family members become ineligible for participation. In the case of families who enter the program with children ages birth through seven, when the parent has achieved his or her educational goals, the family continues to be eligible until all children in the family reach age eight. In contrast, if all children in a family have reached the age of eight and the participating parent has not achieved his or her educational goals, the family continues to be eligible for two more years until the youngest participating child is 10 years old or until the parent is no longer eligible for adult education services under the Adult Education and Family Literacy Act, whichever occurs earlier. In both situations, if a family chooses to continue participating in Even Start under the provisions for continuing family eligibility, the family must participate in all remaining appropriate Even Start services (parenting education, interactive parent and child literacy activities, home visits) until the family exits the program. (Section 1236(b)(2))

If the Even Start program collaborates with a Title I, Part A program and Part A contributes to paying the cost of the Even Start program, families are eligible and may participate in the Even Start program until the parent reaches his or her educational goals, regardless of the age of the child. However, the focus of the local program must continue to remain on serving families with young children. Family ineligibility in this situation occurs when the parent attains his or her educational goals. (Section 1236(b)(3) and the Title I, Part A Collaboration section of this guidance.)

Temporary Absence From the Project

Even Start is unique in that it is designed as a family literacy program, in which the eligibility of parents and children is interdependent. (Section 1236) To be eligible, at least one parent and

one or more eligible children must participate together in an Even Start project. However, should a child or parent be temporarily absent due to extenuating circumstances, the other eligible family members may continue to receive Even Start services.

Local Application

In order to be eligible to receive a subgrant, an applicant must submit an application to the SEA in the form and containing the information required by the SEA. (See the Eligible Entity section of this guidance for further information on what constitutes an eligible applicant.) At a minimum, each application must demonstrate that the applicant has the qualified personnel needed to develop, administer, and implement a high-quality Even Start program and provide access to the special training necessary to prepare staff for program implementation. (Section 1237(b)) Each application must also include a plan of operation and continuous improvement for the program. (Section 1237(c)(1)) The plan must include the following information, as well as any other information required by the SEA:

- (A) a description of the program objectives, strategies to meet those objectives, and how the objectives are consistent with the State's indicators of program quality;
- (B) a description of the activities and services to be provided by the program, including a description of how the program will incorporate all of the program elements required by section 1235 (See the Local Administration – Program Elements section.);
- (C) a description of the population to be served and an estimate of the number of participants to be served;
- (D) as appropriate, a description of the applicant's collaborative efforts with institutions of higher education, community-based organizations, the SEA, private elementary schools, or other eligible organizations, in carrying out the program;
- (E) a statement of the methods that the project will use to: ensure that it will serve families most in need of Even Start activities and services, provide Even Start services to individuals with special needs such as individuals with limited English proficiency and individuals with disabilities, and encourage participants to remain in the program for a time sufficient to meet the program's purpose;
- (F) a description of how the plan is integrated with other ESEA programs or other programs, as appropriate; and
- (G) a description of how the plan provides for rigorous and objective evaluation of progress toward the program objectives described in (A) and for continuing use of evaluation data for program improvement.

Each plan submitted as part of an application is effective for the duration of the subgrantee's participation in Even Start and may be periodically reviewed and revised as needed. The plan may be submitted as part of a consolidated local application. (Section 1237(d))

Fiscal Issues

An Even Start project must use Federal Even Start funds to support the cost of providing family literacy services that involve parents and children, primarily from birth through age seven, in a cooperative effort to help parents become full partners in the education of their children and to

assist children in reaching their full potential as learners. (Section 1234(a)) The remaining cost of the program may be provided in cash or in kind from any source, including any Federal funds other than Even Start. (See the Federal and Local Share and Indirect Costs sections of this guidance for further information.)

Title I, Part A Collaboration

If a project collaborates with a program under Title I, Part A, and Title I, Part A contributes to paying the cost of providing programs under this part to children 8 years of age or older, the Even Start project can allow the participation of families with children 8 years of age or older. (See the Continuing Family Eligibility section of this guidance.) However, the focus of the local program must continue to remain on families with young children. (Section 1236(b)(5)) The intent of this provision is not to divert substantial Even Start funds to families with older children, but to encourage greater contribution from the Title I, Part A program.

Allowable Costs

Projects may use Federal Even Start grant funds and matching resources only for the allowable costs of those projects. (EDGAR, section 80.22) For each type of organization, there is a separate set of Federal principles for determining allowable costs. State-administered grants that have LEAs as the fiscal agent, and Indian tribes and tribal organizations, must use the cost principles in *OMB Circular A-87*. Grantees that have institutions of higher education (IHEs) as the fiscal agent must use the cost principles in *OMB Circular A-21*, and non-profit organizations that are fiscal agents must use *OMB Circular A-122*. (www.whitehouse.gov/omb/circulars/index.html)

The cost principles provide general rules for allowability, and in addition, list alphabetically certain specific items of cost (such as “materials cost”), indicating whether those specific cost items are allowable, unallowable, or allowable only with the prior approval of the awarding agency. In general, unless prohibited by the statute, regulations, or cost principles, local projects may use Even Start funds and matching resources for costs that are necessary and reasonable to meet the objectives of their projects and provide each of the 15 required program elements, including the four core family literacy service instructional components.

Following are some examples of allowable costs. Other allowable costs are found in EDGAR and the applicable cost principles.

- Materials and supplies. Generally, a project may use Federal Even Start funds and matching resources to purchase materials and supplies related to the Even Start project. (See the applicable cost principles under “material costs” or “materials and supplies.”)
- Equipment. Generally, capital expenditures for equipment are allowable as a direct cost when approved by the awarding agency. The cost principles define “equipment” as an article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost which equals the lesser of (a) the capitalization level established by the governmental unit for financial statement purposes, or (b) \$5,000.

Items of equipment with an acquisition cost of less than \$5,000 are considered to be supplies under Circular A-87 and are allowable under all of the cost circulars as direct costs of Federal awards without requiring specific awarding agency approval. (See the applicable cost principles under the paragraph of selected cost items concerning “Equipment and other capital expenditures”: *Circular A-87*, Attachment B, paragraph 19; *Circular A-21*, Section J, paragraph 16; *Circular A-122*, Attachment B, paragraph 15.)

- Food and meals for project participants. A project may use Federal Even Start funds to purchase food and meals for project participants to the extent those expenditures are reasonable and necessary as a support service under section 1235(3), when unavailable from other sources and when necessary for a person’s participation in the Even Start program. For example, providing food may be reasonable and necessary when academic instruction is provided in the evening and participants do not have time to eat at home before coming to the program, at recruitment functions, or when individuals otherwise would not participate in the program. However, entertainment costs, including meals when provided for the purpose of being a social activity or amusement, are unallowable under all of the cost principles.
- Minor remodeling. Even Start projects may use funds for the reasonable and necessary costs of minor remodeling, as that term is defined in EDGAR, section 77.1. Under that definition, “minor remodeling” means, in general, minor alterations to a previously completed building. The specific term does not include building maintenance and repairs, but both are allowable expenditures to the extent they are necessary and reasonable. The term excludes building construction or structural alterations to buildings, which are unallowable expenditures.
- Rental costs of buildings and equipment. Generally, reasonable rental costs are allowable under all of the OMB cost circulars, subject to specific requirements in each applicable OMB cost circular that should be reviewed before a project enters into a rental agreement. The rental or lease costs of buildings and equipment, which are owned by a partner to an Even Start grant (or to another entity with a less-than-arms-length relationship with any of the partners), generally are valued on a different basis than are buildings and equipment rented or leased from a third-party. (Refer to the applicable OMB cost circulars for more detail about valuation.)
- Transportation. Projects may spend Even Start funds on transportation for participants as a support service under section 1235(3), when unavailable from other sources and when necessary for a person’s participation in the Even Start program. Transportation costs must be reasonable and necessary. If a project wishes to provide this transportation through the lease or purchase of a vehicle, such a lease or purchase would be considered a capital expenditure and the applicable OMB cost circular rules for equipment and capital expenditures apply, including the requirement to obtain the approval of the awarding agency.

Unallowable Costs

Following are some examples of unallowable costs. Other unallowable costs are found in EDGAR and the applicable cost principles.

- Indirect costs. Local Even Start projects may not use project funds (including Even Start funds and matching funds) for any indirect costs of a project. (Section 1234(b)(3)) The differences between direct and indirect costs are explained in the applicable cost principles described above. In general, indirect costs are those costs that are incurred for common or joint purposes among multiple cost objectives (for example, the Even Start program and the school district's program) and cannot be readily and specifically identified with a particular final cost objective without effort disproportionate to the results achieved (for example, the cost of heating and lights for a building in which multiple programs are located). States may use the Even Start funds that they reserve for State-level activities for indirect costs at the State level.

Q19: Can a local Even Start program treat a cost, such as an accounting cost, as a direct cost if it treats that same type of accounting cost for the Title I, Part A preschool program, under like circumstances, as an indirect cost?

A19: No. Projects must treat costs consistently across programs as either direct or indirect costs. (OMB Cost Circular A-21, Section C.11; OMB Cost Circular A-87, Section D.2; OMB Cost Circular A-122, Attachment B, Section B.1)

- Constructing, renovating, or acquiring real property. An Even Start project may not use Federal Even Start funds or matching resources to acquire real property, or for construction or renovation. (See EDGAR, section 75.533 for direct grantees of the Department, and section 76.533 for State-administered subgrants.) Construction includes structural alterations to buildings, but does not include minor remodeling (see above).
- Organized fundraising. Under *OMB Cost Circular A-87*, the costs of organized fundraising, including financial campaigns, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions are unallowable. However, expenditures of funds to obtain the statutorily required cost or matching share for Even Start grants are not considered to be unallowable fundraising.

Maintenance of Effort

Beginning with FY 2002, Even Start programs are subject to a maintenance-of-effort requirement (section 9521), which is the same as the requirement that has applied to Title I, Part A for a number of years (section 1120(A)(a)). As applied to Even Start, the maintenance-of-effort requirement means that an Even Start project may receive funds only if the SEA determines that the project's LEA partner's combined fiscal effort per student or the aggregate expenditures of the LEA and the State with respect to the provision of free public education by the LEA for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. However, in cases where a

school district has failed to maintain effort in education expenditures, ED may waive that requirement if such a waiver would be equitable due to-- (1) exceptional or uncontrollable circumstances such as a natural disaster; or (2) a precipitous decline in the financial resources of the local educational agency. For additional information on the maintenance-of-effort requirement, you may want to talk with your Title I State or LEA director.

NATIONAL EVALUATION, LOCAL EVALUATION, AND INDICATORS OF PROGRAM QUALITY

National Evaluation

Since Even Start's first year, the legislation has included an evaluation requirement at the national level. Though the legislative mandate has changed slightly over the years, the national evaluation's basic purposes have remained the same -- to describe Even Start projects and participants, to examine the performance and effectiveness of Even Start projects, and to identify effective Even Start projects for use in program improvement and technical assistance. There have been three national Even Start evaluations since the inception of the program.

The following overall findings have emerged from the three national evaluations completed to date: 1) Even Start projects are generally able to implement the legislatively required program elements. We cannot say that all of the services provided by Even Start projects are of excellent quality, but we do know that all of the legislatively required program elements are being provided and that the letter of the law is met by all but a very few grantees. 2) On average, Even Start participants make gains on measures of literacy. These gains are generally small, particularly given the very low literacy levels of children and adults when they start the program. 3) When information has been available from a randomly-assigned control group, Even Start participants have made literacy gains; however, the gains are no greater than the gains made by members of the control group.

The latest available evidence is from the third national Even Start evaluation's Experimental Design Study (EDS). (To access a copy of the *Third National Even Start Evaluation*, go to www.ed.gov/rschstat/eval/disadv/evenstarthird/toc.html.) Compared with the Even Start population, the 18 EDS projects over-represent Even Start programs that serve ESL Hispanic families in urban areas. While such over-representation means that care should be taken in applying the findings to Even Start projects as a whole, almost 50 percent of the families served by Even Start are Hispanic and about 50 percent of the projects are in urban areas. Hence, the EDS findings apply to an important and growing part of the Even Start population. The key findings include:

- While Even Start children and parents made gains on literacy assessments and other measures, children and parents in the 18 Even Start programs that participated in the EDS did not gain more than children and parents in the control group, about one-third of whom also received early childhood education or adult education services.
- Even Start serves a very disadvantaged population. Compared with Head Start, Even Start parents are much less likely to have a high school diploma, and Even Start families have substantially lower annual household income.
- Even Start children and parents made small gains on literacy measures and scored low compared to national norms when they left the program. Even Start children gained four standard score points on the Peabody Picture Vocabulary Test, the same gain made by control group children and by children in the Head Start FACES study.

- Families in the program do not take full advantage of the services offered by Even Start projects; they participate in a small amount of instruction relative to their needs and program goals.
- While the early childhood classroom experiences provided by the EDS projects were of overall good quality, there was not sufficient emphasis on language acquisition and reasoning to produce measurable impacts and hence to achieve legislative outcomes. Further study is needed to better document the quality and content of Even Start's instructional services.
- The extent to which parents and children participated in literacy services is related to child outcomes.

Each of the national evaluations has shown that Even Start is a complicated program that takes time to understand and implement fully. The focus on literacy for the family as a unit is a special challenge, as is the requirement to build on existing services to create a unified family literacy program in a community. Maintaining a literacy focus and ensuring that collaborators share the goals and objectives of Even Start are critical factors, since Even Start projects are held accountable for literacy outcomes, regardless of collaborators' objectives. By integrating the four core instructional components, Even Start projects seek to provide a value-added dimension to families' literacy experiences and outcomes. These characteristics make Even Start unique and exciting, but also difficult to evaluate.

The Department is implementing several strategies to help States and local projects improve program performance, in part, to directly respond to findings from the *Third National Even Start Evaluation*. ED is working with States and local projects to strengthen the quality of each instructional component and identify examples of local projects that are achieving significant results in student achievement. In addition, ED will conduct a peer review of State indicators of program quality to ensure that all States have indicators that reflect high standards, use appropriate assessment tools, and allow States to use their indicators to monitor and improve local projects. Also, ED is helping to improve the quality of State and local evaluations through development of a revised guide to local evaluation and accompanying technical assistance.

Classroom Literacy Interventions and Outcomes Study (CLIO) (2003-07)

Research evidence from previous national Even Start evaluations has prompted an evaluation effort to identify effective family literacy models. Two experimental evaluations have shown that Even Start projects, as currently implemented, have not been effective at increasing the literacy skills of participating children and their parents over and above that of control children and their parents. The CLIO study will test the effectiveness of various enhanced family literacy interventions in promoting: (a) literacy and other school readiness skills in low-income children; (b) parent literacy; and (c) parent involvement as teachers of their own child, especially in the area of early literacy. The goal of the CLIO study is to provide information for Even Start family literacy projects on the literacy gains made by children and parents who participate in projects offering different family literacy curricula.

Local Evaluation

Each Even Start project is required to conduct an independent evaluation of the program to be used for continuous program improvement. (Section 1235(15)) These evaluations are generally conducted annually and provide local projects with critical information on individual participant achievement results and areas of program strength and weakness. These evaluations also provide local projects, States, the Department, and the Congress with objective data about the activities and services provided by the project, all the participants served, the retention rates of those participants, and the achievement of all families in the project. (See Local Administration – Program Element #15 for more information.)

Indicators of Program Quality

Section 1240 requires each State that receives Even Start funds to develop indicators of program quality to use in monitoring, evaluating, and improving local Even Start programs within the State.

In addition, the Department encourages States to develop performance standards and benchmarks for each program indicator and use them for increased local program accountability and program improvement. Development of a complete system of accountability -- comprised of indicators of program quality and performance standards and benchmarks -- is important so that each State will have its own uniform and workable method to measure and evaluate whether or not local programs have made sufficient progress and improvement in participant outcomes. This accountability system will give each State objective and explicit data on which programs are showing gains in participant literacy, which ones need technical assistance and in what areas, and which programs should or should not receive continued funding.

Starting in 2003, the Department will also use its monitoring authority, under the General Education Provisions Act: (20 USC 1232f(b), 1234(c), and 1234(f)), to perform a peer review of States' Even Start performance indicators. The review process will be used to ensure that all States have indicators that reflect high standards, and use appropriate assessment tools, and that States are able to use their indicators to monitor and improve local Even Start programs and participant literacy achievement results.

ADDITIONAL RESOURCES FOR FAMILY LITERACY

Federal Even Start funds are not the only source of funding for family literacy programs. Funding for family literacy programs or for individual components of a family literacy program may come from a variety of sources at the Federal, State, and local levels.

Common Definition of Family Literacy

The following Federal legislation shares a generally common definition of “family literacy services”:

- Elementary and Secondary Education Act of 1965 (as amended by the No Child Left Behind Act of 2001)
- Head Start Act of 1998
- Adult Education and Family Literacy Act (Workforce Investment Act)
- Community Services Block Grant Act

Title I, Part A

Title I, Part A of the ESEA provides formula grants to LEAs to improve the teaching and learning of children in high-poverty schools to enable them to meet challenging academic content and performance standards. The program emphasizes parental involvement and encourages each school to provide training to help parents work with their children to improve their school achievement.

Schools may use Title I, Part A funds to provide necessary literacy training for parents if all reasonably available sources of funding have been exhausted, and they are encouraged to work with communities to provide health, nutrition, and social services that are not otherwise available to the children being served. LEAs must reserve at least one percent of their Title I, Part A allocations for parent involvement activities including promoting family literacy and parenting skills, unless the one percent is \$5,000 or less. (Section 1118(a)(3)) Title I, Part A funds may also be used for preschool programs for educationally disadvantaged children who reside in high-poverty areas.

In addition, section 1111(c)(14) requires SEAs to encourage LEAs and individual schools participating in Title I, Part A programs to offer family literacy services (using Title I, Part A funds), if the LEA or school determines that a substantial number of disadvantaged students have parents who do not have a high school diploma or its recognized equivalent or have low levels of literacy. (For additional information on Title I, Part A, go to www.ed.gov/programs/titleiparta/index.html.)

Early Reading First, Title I, Part B, Subpart 2

The Early Reading First program provides competitive grants to eligible school districts and other public and private organizations located in those school districts, to transform existing early education programs into centers of excellence that provide high-quality, early education to young children, especially those from low-income families. The overall purpose of the Early

Reading First program is to prepare young children to enter kindergarten with the necessary language, cognitive, and early reading skills to prevent reading difficulties and ensure school success.

A variety of preschool programs located in eligible school districts, including Even Start family literacy programs, may apply for Early Reading First funds. All programs receiving Early Reading First grants must demonstrate how they: provide children with a high quality language- and literature-rich environment; provide professional development for staff in research-based early language and reading development; use a language and early literacy curriculum based in scientific research; and use screening assessments to effectively identify preschool-age children who may be at risk for reading failure. As Even Start programs primarily serve children from ages birth through seven, they are well equipped to ensure that there is continuity between preschool and kindergarten educational experiences, which is a key objective of the Early Reading First program. (For additional information on Early Reading First, go to <http://www.ed.gov/programs/earlyreading/index.html>.)

Migrant Education, Title I, Part C

The Migrant Education program (MEP) authorizes States to design services that bridge gaps in a student's education caused by his or her parents' moves to work in agriculture and other qualifying industries. Each State designs its services by giving priority to migratory children who are failing, or most at risk of failing, academically and whose education has been interrupted during the regular school year. Because of the nature of the migrant family lifestyle, migrant education programs generally coordinate resources and integrate services using Federal sources including Title I, Part A, State-administered Even Start, 21st Century Community Learning Centers, Head Start, and Migrant and Seasonal Head Start programs, as well as State and local education, health, housing, and other programs. State and local migrant programs have also developed a wide array of strategies that enable projects that serve the same migrant students to communicate and coordinate with one another.

Family literacy activities are among the allowable strategies cited in section 1304 to meet the unmet needs of preschool migratory children. Migrant education funding is derived from a count of eligible children ages 3-21. Migrant education funds may provide family literacy services to children from birth, and to their parents as well, depending on the State's priority for providing services to migrant students. States and local migrant education projects, therefore, may choose family literacy as a means to serve migrant children and their parents.

It is important to note that, for highly mobile migrant families, progress in reaching literacy goals may require access to family literacy services that operate across school district, State, program, and national boundaries. Migrant Education Even Start (MEES), a set-aside program in Title I, Part B, Subpart 3 of the ESEA, is strengthening the capacity of its grantees to provide high-quality intensive services on a year-round basis. With planning, collaboration, and coordination that includes education funding, as well as community-based and volunteer programs, migrant education programs can leverage family literacy services no matter where migratory agricultural families travel to work and live. (For additional information on Migrant Education, go to <http://www.ed.gov/about/offices/list/oese/ome/index.html>.)

Head Start

Head Start provides comprehensive early childhood, health, disabilities, and family support services to 905,000 young children from low-income families, including more than 55,000 infants, toddlers, and pregnant women. Head Start's historic focus on serving economically disadvantaged young children through a two-generational strategy of early childhood and parent services meshes well with the goals and strategies of Even Start. Many local Head Start agencies are collaborating with Even Start programs, adult education providers, and other family literacy organizations in providing family literacy services. The Head Start and Even Start legislation share a common definition of "family literacy services". The HHS Head Start Bureau and ED are partnering in a variety of initiatives, including national leadership forums, a major jointly funded training and technical assistance project with the National Center for Family Literacy, and joint efforts to develop outcome measures for local programs.

Adult Education

The Adult Education and Family Literacy Act (Title II of the Workforce Investment Act) provides important resources to fund the adult literacy component of a family literacy program. The three most common types of instruction that States support through adult education grants are: adult basic education for basic literacy services for adults whose skills are below the eighth grade level; adult secondary education for services designed to prepare students to obtain a high school equivalency diploma; and English literacy services for adults with limited English proficiency. Adult education funds may also be used in family literacy programs for support services such as child care and transportation. (For additional information on Adult Education, go to <http://www.ed.gov/about/offices/list/ovae/index.html>.)

Bureau of Indian Affairs

The BIA/Office of Indian Education Programs funds family literacy programs that are similar to Even Start family literacy programs. The Family and Child Education (FACE) program is implemented in 32 Bureau-funded schools, integrated within each school's Consolidated School Reform Plan, and adopted as a research-based school reform model. FACE funds are provided to Bureau-funded schools to implement unique and culturally appropriate family literacy models.

FACE serves American Indian families with children ages birth to eight at home and at Bureau-funded schools. The requirements for enrollment are that families served live within the boundaries of a Bureau-funded school to which their children attend or would be eligible to attend upon reaching school age. FACE is a full-day program operating four days per week with one day set aside for planning. FACE operates on a school-year basis. Technical assistance is provided in an ongoing commitment to all FACE staff, K-3 teachers and school administrators at national meetings and on-site. Other non-Bureau programs such as Even Start and Indian Head Start have participated in the technical assistance trainings.

Education for Homeless Children and Youth, (McKinney-Vento Act)

Title X, Part C of the No Child Left Behind Act amended the McKinney-Vento Homeless Assistance Act, which authorizes State formula grants for the Education for Homeless Children and Youths program. The McKinney-Vento Act was enacted to confront the problems of homelessness in this nation and mandates State action to ensure that State and local educational agencies address barriers to the enrollment, attendance, and success in school of children and youth who are experiencing homelessness.

The McKinney-Vento program establishes an Office for the Education of Homeless Children and Youths in participating States and a local liaison in all LEAs. One of the duties of the local education agency liaison is to ensure that homeless families and pre-school-aged children receive educational services such as Even Start family literacy programs, if needed. LEA subgrants may be used to support developmentally appropriate early childhood education programs, not otherwise provided through Federal, State, or local funding, for preschool-aged homeless children. (For additional information on Education for Homeless Children and Youth, go to <http://www.ed.gov/programs/homeless/index.html>.)